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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

18 MAURICIO JASSO, individually and in his  
19 capacity as the Court-Appointed Receiver of  
20 JAMA INVESTMENT GROUP, INC., *et al.*,

21 Plaintiff(s),

22 vs.

23 WELLS FARGO BANK, N.A., KATHERINE  
24 DARRALL, and JOSE RICO;

25 Defendant(s).

Case Number  
2:20-CV-00858-RFB-BNW

**STIPULATION AND ORDER FOR  
EXTENSION TO FILE RESPONSE  
AND REPLY TO WELLS FARGO  
BANK, N.A.'S MOTION FOR  
PROTECTIVE ORDER REGARDING  
THE UNTIMELY AND IMPROPERLY  
NOTICED DEPOSITION OF  
ALEXANDER NELSON [ECF NO. 291]**

**(FIRST REQUEST)**

26 Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1, Plaintiffs  
27 Mauricio Jasso ("Jasso"), individually and in his capacity as the court-appointed receiver of JAMA  
28

1 Investment Group, Inc. (“JAMA”), Guillermo Sesma (“Sesma”), Sylvia Martinez Salinas  
2 (“Salinas”), Belisario Jasso Baldini (“Baldini”), Javier Ramirez Lares (“Lares”), Antonio Bachalani  
3 (“Bachalani”), Rodrigo Fernandez (“Fernandez”), Juan Romero (“Romero”), and Bernardo  
4 Villacecias (“Villacecias”) (collectively, “Plaintiffs”), and Defendants Wells Fargo Bank, N.A.  
5 (“Wells Fargo”), Katherine Darrall (“Darrall”), (collectively, “Defendants” and together with  
6 Plaintiffs, the “Parties”), hereby stipulate and agree to extend Plaintiffs’ deadline to file their  
7 Response to Wells Fargo Bank, N.A.’s Motion for Protection Regarding the Untimely and  
8 Improperly Noticed Deposition of Alexander Nelson [ECF No. 291] from October 21, 2022 to  
9 October 27, 2022 and extend Wells Fargo Bank, N.A.’s deadline to file its respective Reply by 5  
10 days (from November 3 to November 8, 2022) for the following reasons:

11 1. On October 7, 2022, Wells Fargo Bank, N.A. filed a Motion for Protection  
12 Regarding the Untimely and Improperly Noticed Deposition of Alexander Nelson [ECF No. 291].

13 2. Accordingly, Plaintiffs’ Response to the Motion for Protection is due on October  
14 21, 2022.

15 3. Counsel for Plaintiffs has been working diligently on their Plaintiffs’ Response to  
16 the Motion for Protection but requires additional time due to multiple deadlines falling within this  
17 fourteen-day period, including the deposition schedule in this case, and scheduling deadlines in  
18 other cases.

19 4. No prejudice will result due to a 1-week extension, as the hearing on this motion  
20 has been scheduled for November 16, 2022.

21 5. If the extension is granted, Wells Fargo’s reply in support of its motion would be  
22 due November 3, 2022. Wells Fargo seeks a few extra days until November 8, 2022 due to  
23 scheduling deadlines in this and other cases. This would result in briefing on this motion  
24 completed more than one week before the November 16 hearing date.

25 6. This extension request is sought in good faith and is not made for the purpose of  
26 delay.

27 THEREFORE, for good cause shown, the Parties respectfully request an extension of  
28 deadlines as follows:

- October 27, 2022 – Deadline for Plaintiffs to file their Response to Wells Fargo Bank, N.A.’s Motion for Protection Regarding the Untimely and Improperly Noticed Deposition of Alexander Nelson [ECF No. 291]
- November 8, 2022 – Deadline for Wells Fargo to file its Reply in Support of the motion.

**SGRO & ROGER***/s/ Kelly B. Stout*

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 BANK, N.A.*

**IT IS SO ORDERED.**


UNITED STATES MAGISTRATE JUDGE

DATED: October 21, 2022

**CERTIFICATE OF SERVICE**

I certify that I am an employee of Sgro & Roger and that on , service of the foregoing  
**STIPULATION AND ORDER FOR EXTENSION TO FILE RESPONSE AND REPLY TO**  
**WELLS FARGO BANK N.A.'S MOTION FOR PROTECTIVE ORDER REGARDING THE**  
**UNTIMELY AND IMPROPERLY NOTICED DEPOSITION OF ALEXANDER NELSON**  
**[ECF NO. 291] (FIRST REQUEST)** was made by mandatory electronic service through the United  
States District Court's electronic filing system and/or by depositing a true and correct copy in the  
U.S. Mail, first class postage prepaid, and addressed to the following at their last known address:

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